

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com

7 *Attorneys for Defendant,*
8 *Joseph Lombardo*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 JUAN C. RIOS,

12 Plaintiff,

13 vs.

14 JOSEPH LOMBARDO, CLARK COUNTY
SHERIFF; and DOES 1-100, ROE
15 Corporations I – X, inclusive,

16 Defendants.

CASE NO.: 2:17-cv-03074-RFB-BNW

**STIPULATION TO EXTEND TIME TO
FILE A REPLY IN SUPPORT OF
DEFENDANT’S MOTION FOR
RECONSIDERATION
[ECF No. 103]**

17 Defendant Joseph Lombardo (“Lombardo”), through his counsel, Kaempfer Crowell, and
18 Plaintiff Juan C. Rios, through his counsel, Hamilton Law, stipulate and agree to extend the
19 current deadline of May 9, 2025, for Lombardo to file a Reply in support of the Motion for
20 Reconsideration, (ECF No. 103), by seven days, which will create a new deadline of **May 16,**
21 **2025.**

22 1. On April 4, 2025, Defendant Lombardo filed a Motion for Reconsideration, (ECF
23 No. 103).

24 2. Plaintiff filed a Response, (ECF No. 109), on May 2, 2025.

1 3. Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1 impose a good cause
2 standard to extend the deadline file a Reply. “‘Good cause’ is a non-rigorous standard that has
3 been construed broadly across procedural and statutory contexts.” *Ahanchian v. Xenon Pictures,*
4 Inc., 624 F.3d 1253, 1259 (9th Cir. 2010).

5 4. Good cause exists to extend the deadline for Lombardo to file the Reply by one
6 week as Lombardo’s counsel will be out of the Office for several days attending the 2025
7 District Court Conference in Reno Nevada and so additional time is needed to file the brief.

8 5. An extension of time will ensure that the Court has appropriate briefing on
9 Lombardo’s Motion for Reconsideration before making a ruling. Neither party will suffer
10 prejudice from an extension of time.

11 DATED this 7th day of May, 2025.

12 KAEMPFER CROWELL

HAMILTON LAW

13 By: /s/ Lyssa S. Anderson
14 LYSSA S. ANDERSON
15 Nevada Bar No. 5781
KRISTOPHER J. KALKOWSKI
16 Nevada Bar No. 14892
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Attorneys for Defendant
17 *Joseph Lombardo*

By: /s/ Ryan A. Hamilton
RYAN A. HAMILTON, ESQ.
Hamilton Law
5125 S. Durango Drive
Las Vegas, NV 89113
Attorneys for Plaintiff

18 **IT IS SO ORDERED.**

19 DATED this 8th day of May, 2025.

20
21 

22 **RICHARD F. BOULWARE, II**
23 **UNITED STATES DISTRICT JUDGE**
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